PACIFIC GAS AND ELECTRIC COMPANY

PG&E

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JAMES D. SHIFFER
VICE PRESIDENT
NUCLEAR POWER GENERATION

April 10, 1986

PGandE Letter No.: DCL-86-097

Mr. John B. Martin, Regional Administrator
U. S. Nuclear Regulatory Commission, Region V
1450 Maria Lane, Suite 210
Walnut Creek, CA 94596-5368

Re: Docket No. 50-323, OL-DPR-82
Diablo Canyon Unit 2
Response to IEIR 50-323/86-05 -- Notice of Violation

Dear Mr. Martin:

NRC Inspect' on Report 50-323/86-05, dated March 11, 1986, contained a Notice of Violation citing one Severity Level IV violation. PGandE's response to this Notice of Violation is enclosed.

Kindly acknowledge receipt of this material on the enclosed copy of this letter and return it in the enclosed addressed envelope.

Sincerely,

for J. D. Shiffer

Enclosure

cc: L. J. Chandler
R. T. Dodds
B. Norton
H. E. Schierling
S. A. Varga
CPUC
Diablo Distribution

0809S/0043K/DJH/96

IE01

ENCLOSURE

RESPONSE TO NOTICE OF VIOLATION IN NRC
INSPECTION REPORT NO. 50-323/86-05

On March 11, 1986, NRC Region V issued a Notice of Violation (Notice) citing one Severity Level IV violation as part of NRC Inspection Report 50-323/86-05 (Inspection Report) for Diablo Canyon Unit 2. This Notice cited a concern regarding a failure to perform surveillance on a spare instrument test line located within containment penetration 82.

STATEMENT OF VIOLATION

"Technical Specification surveillance requirement 4.6.1.1.a states that containment integrity shall be demonstrated during modes 1-4, "At least once per 31 days by verifying that all penetrations not capable of being closed by OPERABLE containment automatic isolation valves and required to be closed during accident conditions are closed by valves, blind flanges, or deactivated automatic valves secured in their positions...."

Contrary to the above, a spare instrument test line through penetration 82 was not included as part of the containment integrity surveillance program and, as such, had not been verified capped and sealed since commencement of initial operation in July 1985.

This is a Severity Level IV Violation (Supplement I)."

EXPLANATION, CORRECTIVE STEPS TAKEN, AND RESULTS ACHIEVED

As indicated in the Inspection Report, during a routine walkdown of containment piping penetrations and valving, the NRC inspector noted several discrepancies between the as-built configurations and the FSAR Update Table 6.2-39 and Figure 6.2-19. These findings were discussed with plant engineers. Subsequently, plant engineers inspected containment penetration 82 both outside and inside containment and identified a spare capped instrument line that was not included in surveillance test procedures (STPs) I-1C, I-1D and V-6.

When the Unit 2 procedures (STPs I-1C, I-1D and V-6) were prepared, plant engineers performed walkdowns to verify the procedures. The spare instrument test line is difficult to see due to lagging that surrounds the penetration and thus was inadvertantly not included in STPs I-1C, I-1D and V-6.

On-the-spot-changes (OTSCs) were issued for STPs I-1D and V-6 to include the spare instrument test line. The instrument test line was sealed and STPs were performed which verified the instrument test line was capped and sealed.

The Unit 2 penetration area was walked down outside containment to verify that all the penetrations were adequately addressed in the STPs. No further discrepancies were found between STPs I-1D and V-6 and the actual plant configuration. Also, a successful Unit 2 Integrated Leak Rate Test (ILRT) was performed in August 1984 which demonstrated containment integrity. This test

could not have been successfully completed with the subject penetration open. When the spare instrument test line was identified in February 1986, it was found capped. Therefore, it can be concluded that the instrument test line has been capped since August 1984 and that the Unit 2 containment integrity was maintained.

The DCPP Operations Engineering Department has implemented a program to ensure that an independent walkdown or dry run of a procedure is performed, as applicable, as part of the independent verification process.

CORRECTIVE STEPS WHICH WILL BE TAKEN

The spare instrument test line will be included in STP I-1C, Mode 6 Checklist, "Weekly Checks Required by Licenses", prior to the time the next surveillance is required.

Detailed walkdowns of all Units 1 and 2 outside containment penetrations will be conducted to verify actual configurations and to update FSAR Table 6.2-39 and Figure 6.2-19 and appropriate plant drawings. The results of these walkdowns will be included in the next FSAR Update which is currently scheduled for September 1986. Detailed walkdowns of all Units 1 and 2 inside containment penetrations will be conducted to verify actual configurations during the next refueling outages for Units 1 and 2 to update FSAR Table 6.2-39 and Figure 6.2-19 and appropriate plant drawings. The results of these walkdowns will then be included in the next FSAR Update following these outages.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

As discussed above, full compliance was achieved when the OTSCs were issued for STPs I-1D and V-6 and the STPs were performed which verified the instrument test line was capped and sealed.